

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: ALEXIS LEE ALLBROOKS,  
DEBTOR(S)

CHAPTER 13 BANKRUPTCY  
CASE NO. 19-52458-KMS

DAVID RAWLINGS, TRUSTEE

**TRUSTEE'S MOTION TO DETERMINE FINAL CURE**

COMES NOW, the Trustee, David Rawlings, by and through his attorney, and files this Motion to Determine Final Cure of 21<sup>st</sup> Mortgage Corporation (21), and says:

1. That the Trustee has paid the pre-petition arrearage of \$1,305.54, pursuant to 21's Claim (Claim arrearage was through 12-2019). Future mortgage payments were to be in the Plan, and the Trustee has paid the future mortgage payments from 01-2020 through 04-2025. The Plan term was modified to be 60 months following Confirmation. Numerous Notices of Mortgage Payment Change were filed, with the monthly mortgage payments being adjusted as requested. There were no Notice(s) of Post Petition Fees filed.

2. That 21's 05-20-2025 Response to the Trustee's Notice of Final Cure (Dkt#65) states that the full amount required to cure the pre-petition default has been paid in full and that the loan is due for the 02-2025 monthly payment, which the Trustee has paid (through April, 2025).

WHEREFORE, PREMISES CONSIDERED, the Trustee files this Motion to Determine Final Cure to confirm the post-petition mortgage payments have been paid through 04-2025 and that the loan is due, contractually, for the 05-2025 monthly payment (not including any subsequent

payments made by the Debtor) and prays for such other relief, either general or specific, as to which this Court may deem meet and proper.

Respectfully submitted,

DAVID RAWLINGS, TRUSTEE

BY: /s/Samuel J. Duncan  
Samuel J. Duncan,  
His Attorney

Samuel J. Duncan  
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**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that I have on this day forwarded a true and correct copy of the foregoing Motion, via the Court's ecf filing system, to: the US Trustee, 501 East Court Street, Suite 6-430, Jackson, Mississippi 39201; TC Rollins, Jr.; and by US Mail, postage fully prepaid to: Jonathan Russell, 21<sup>st</sup> Mortgage Corp, PO Box 477, Knoxville, TN 37901.

So certified on this the 23<sup>rd</sup> day of May, 2025.

/s/Samuel J. Duncan  
Samuel J. Duncan